

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA

In Re:	Case No. 23-00623
MERCY HOSPITAL, IOWA CITY, IOWA ,	Chapter 11
Debtor-In-Possession.	

OBJECTION TO TRUSTEE’S OBJECTION TO PROOF OF CLAIM NO. 10115

COMES NOW Creditor Communications Engineering Company (“CEC”) , through its undersigned counsel, and in support of its Objection to Trustee’s Objection to Proof of Claim No. 10115 filed by CEC states as follows:

1. CEC filed POC #10115 on September 8, 2023 in the amount of \$122,833.83 and attached to such Proof of Claim certain purchase orders and invoices supporting the claim amount.
2. CEC provided the services to the Debtor as set forth in the purchase orders and invoices attached to POC #10115.
3. On January 2, 2024, the Debtor submitted a payment to CEC in the amount of \$61,106.67 on an invoice dated August 31, 2023 that was included in CECs’ POC #10115, leaving a balance owing by the Debtor on POC #10115 of \$61,727.26.

4. The Trustee's Objection contains no substantive information as to which, if any, of the other invoices or purchase orders attached in support of POC #10115 the Trustee is objecting to or contends has been paid beyond the payment on the August 31, 2023 invoice as referenced above.

5. Accordingly, absent supporting information and a specific allegation as to the basis of the Trustee's objection, CEC asserts that POC #10115 should be allowed in the revised amount of \$61,727.26.

WHEREFORE CEC prays that the Court enter an Order denying the relief sought by the Trustee's Objection and allowing POC #10115 as a non-priority general unsecured claim in the amount of \$61,727.26, and for any and all other relief deemed just and equitable in the premises.

/s/ Terry L. Gibson
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**COUNSEL TO COMMUNICATIONS
ENGINEERING COMPANY**

Certificate of Service

The document was served electronically on parties who receive electronic notice through the CM/ECF as listed on CM/ECF's notice of electronic filing.

Dated this 21st day of April, 2025.

/s/ Terry L. Gibson
Terry L. Gibson